

Paul C. Ulrich, *Pro Se* Plaintiff
Four Seasons Place, #2036
8 Finance Street, Central, Hong Kong
Paul_Ulrich@aya.yale.edu
Tel. (852) 6271-9384

15 October 2014

Via Electronic Case Filing ("ECF") to:

The Honorable Vernon S. Broderick, U.S.D.J.,
U.S. District Court for the Southern District of New York

Subject: Defendants Take No Position Regarding Plaintiff's Proposed FRCP 54(b) Motion
Ulrich v. Moody's Corporation *et al*, 13-CV-00008 (VSB)

Dear Judge Broderick:

Earlier today, the Plaintiff wrote to Mr. Nuccio, Defendants' counsel, to ask if they were still planning to respond to the Plaintiff's pre-motion-conference letter for a Fed. R. Civ. P. 54(b) motion, filed with Your Honor's chambers on 7 October 2014 as ECF 51. Mr. Nuccio replied that the Defendants take no position on the request in that letter but are prepared to address any questions that Your Honor may have if you choose to conduct such a pre-motion conference.

Plaintiff asks that Your Honor view this lack of objections from Defendants as consent to the proposed FRCP 54(b) motion and rule accordingly. If you prefer to first hold a conference, Plaintiff respectfully asks that participation of all parties be by phone and as early in the day as possible to account for Plaintiff's presence in Hong Kong, which is either 12 or 13 hours ahead of New York's time.

If Your Honor would like a formal motion, please instruct accordingly and Plaintiff will submit one but would prefer to dispense with an accompanying memorandum of law since his ECF 51 letter to your chambers already raised all his legal points on the matter.

Respectfully submitted,

s/ Paul C. Ulrich

Paul C. Ulrich
Pro Se Plaintiff

cc: Joseph A. Nuccio, Esq. (via email)